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14 *re Google Play Consumer Antitrust Litigation*

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 **IN RE GOOGLE PLAY CONSUMER**
19 **ANTITRUST LITIGATION**

20 **RELATED ACTIONS:**

21 *Epic Games Inc. v. Google LLC et al.*,
22 Case No. 3:20-cv-05671-JD

23 *In re Google Play Developer Antitrust*
24 *Litigation*, Case No. 3:20-cv-05792-JD

25 *State of Utah, et. al., v. Google LLC, et al.*,
26 Case No. 3:21-cv-05227-JD

27 *Match Group, LLC, et. al. v. Google LLC, et*
28 *al.*, Case No. 3:22-cv-02746-JD

No. 3:20-CV-05761-JD

DECLARATION OF KARMA M.
GIULIANELLI IN SUPPORT OF
CONSUMER PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
MOTION TO EXCLUDE
TESTIMONY OF DR. HAL J. SINGER
ON CLASS CERTIFICATION

Judge: Hon. James Donato

1 I, Karma M. Giulianelli, declare as follows:

2 1. I am an attorney duly admitted to practice in the State of California and
3 before this Court. I am a partner at Bartlit Beck LLP, Co-Lead Counsel for the Proposed Classes
4 in this action. I submit this declaration in support of Consumer Plaintiffs' Opposition to
5 Defendants' Motion to Exclude Testimony of Dr. Hal J. Singer on Class Certification. The
6 contents of this declaration are based on my personal knowledge, including my personal
7 knowledge of the documents cited herein. The facts set forth herein are within my personal
8 knowledge and if called as a witness, I could and would competently testify to them.
9

10 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Class
11 Certification Report of Hal J. Singer, Ph.D, which was submitted in this action on February 28,
12 2022.

13 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Class
14 Certification Reply Report of Hal J. Singer, Ph.D, which was submitted in this action on April
15 25, 2022.
16

17 4. Attached hereto as **Exhibit 3** is an excerpt of a true and correct copy of
18 the deposition transcript of Hal J. Singer, taken in this litigation on May 12, 2022.

19 5. Attached hereto as **Exhibit 4** is a true and correct excerpt of the book N.
20 GREGORY MANKIW, PRINCIPLES OF MICROECONOMICS 273, 285 (Cengage Learning 8th ed.
21 2018).
22

23 6. Attached hereto as **Exhibit 5** is an excerpt of a true and correct copy of
24 the deposition transcript of Michelle M. Burtis, taken in this litigation on May 16, 2022.

25 7. Attached hereto as **Exhibit 6** is a true and correct copy of Plaintiffs'
26 Exhibit 937, which is the article Nathan Miller, Marc Remer, & Gloria Sheu, *Using cost pass-*
27 *through to calibrate demand*, 118 ECONOMICS LETTERS 451 (2013).
28

DECLARATION IN SUPPORT OF CONSUMER PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF DR. HAL J. SINGER
Case No. 3:20-CV-05761-JD

1 8. Attached hereto as **Exhibit 7** is a true and correct copy of the Expert
2 Report of Dr. Michelle M. Burtis, submitted in this action on March 31, 2022.

3 9. Attached hereto as **Exhibit 8** is a true and correct copy of the book chapter
4 Kenneth Train, *Logit, in* DISCRETE CHOICE METHODS WITH SIMULATION 34-75.

5 10. Attached hereto as **Exhibit 9** is a true and correct copy of the article
6 Gregory Werden & Luke Froeb, *The Effects of Mergers in Differentiated Products Industries:*
7 *Logit Demand and Merger Policy* 10(2) Journal of Law, Economics, & Organization 407 (1994).
8

9 11. Attached hereto as **Exhibit 10** is a true and correct copy of the article
10 Anindya Ghose & Sang Pil Han, *Estimating Demand for Mobile Applications in the New*
11 *Economy*, 60(6) MANAGEMENT SCIENCE 1470 (2013).
12

13 12. Attached hereto as **Exhibit 11** is an excerpt of a true and correct copy of
14 the deposition transcript of Daniel Scalise, taken in this litigation on March 11, 2022

15 13. Attached hereto as **Exhibit 12** is a true and correct copy of a document
16 produced by Google in this litigation bearing the Bates range GOOG-PLAY-000355570.R to
17 GOOG-PLAY-000355629.R.

18 14. Attached hereto as **Exhibit 13** is a true and correct copy of the article
19 Simon Anderson & Andre de Palma, *The Logit as a Model of Product Differentiation* 44 OXFORD
20 ECONOMIC PAPERS 51-67 (1992).
21

22 15. Attached hereto as **Exhibit 14** is a true and correct copy of a document
23 produced by Google in this litigation bearing the Bates range GOOG-PLAY-000579868.R to
24 GOOG-PLAY-000579884.R.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 23th day of June, 2022 at Denver, Colorado.

DECLARATION IN SUPPORT OF CONSUMER PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF DR. HAL J. SINGER
Case No. 3:20-CV-05761-JD